

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Part 97 of the Commission's Rules No. 05-235)	WT Docket
To Implement WRC-03 Regulations Applicable to)	
Requirements for Operator Licenses in the)	
Amateur Radio Service)	
)	

To the Commission:

Comments of Alan L. Anderson, AB4TF
Amateur Radio Operator

In this Notice of Proposed Rulemaking, the Commission proposes that knowledge of the Morse code be dropped as a requirement for an amateur radio operator license. In my comments, I propose steps to preserve the special value of the Morse code for amateur radio and yet follow the strong trend to remove Morse code as a licensing requirement.

Morse code benefits for amateur radio

Morse code provides many important benefits to the modern amateur radio service including:

1. Simple low-power communication systems capable of communicating around the world on the high frequency (HF) amateur radio bands.
2. Inexpensive equipment that can be owned by amateur radio operators of modest means.
3. A communications mode that functions well between people who speak different languages.

4. A communications mode that is well supported by home-made and kit-built radio equipment.
5. Morse code transmitters and receivers are easy to repair in the field.
6. In an extreme emergency, amateurs can provide Morse code communications using improvised equipment.
7. Preserve a well established legacy of amateur radio performance and recognition.

Alternatives to a Morse code licensing requirement

It is clear from the Commission's NPRM and the comments of the amateur radio community that despite the benefits, the Morse code requirement for amateur radio licensing will be eliminated. This follows the trend established by many nations throughout the world even though some nations such as Russia and Japan are keeping Morse code licensing requirements.

Despite this trend it is highly desirable to encourage the benefits and use of Morse code for the amateur radio service. The following comments discuss alternatives to include Morse code in the amateur radio regulatory structure.

Existing Morse code sub bands

I recommend the Commission retain the existing Morse code sub bands or establish the regulation-by-bandwidth proposal being proposed by the ARRL. In the ARRL proposal, sub bands are proposed for narrow-band digital modes including Morse code.

New Morse code sub bands

At some point in the future the Commission may allocate new spectrum to the amateur radio service. All spectrum, but especially spectrum in the low frequency ranges of 137 kHz, 190 kHz, and/or 500 kHz should include sub bands for

Morse code operation. These sub bands can be shared with other narrow-band digital modes.

Optional Morse code testing

The Commission should adopt a procedure wherein volunteer examiners have the option of replacing a subset of the Extra Class written exam with a 5 wpm Morse code test. This option would be provided at the request of the applicant.

Respectfully submitted,

**Alan L. Anderson, AB4TF
Amateur Radio Extra Class Licensee
14922 Boydell Drive
Centreville, VA 20120-1534
(703) 815-2039**

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